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October 9, 2020

via the Court's ECF system
Mr. Steven Valverde, Case Manager
Second Circuit Court of Appeals
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: *In re Norma Knopf and Michael Knopf*,
Docket No. 20-3091

Dear Mr. Valverde:

I am writing to correct a typographical error in the Knopfs' mandamus petition. The petition states, at pp. 9-10, that the Knopfs dismissed Michael Sanford from the cases below because they have a "satisfied" \$10 million dollar judgment against him. (ECF 8-1, at pp. 9-10.) That was a typing error.

In fact, the Knopfs' judgment against Sanford is *unsatisfied*. The judgment against Sanford was awarded in a decision by State Court Justice Gerald Lebovits on February 4, 2019. *Knopf v. Sanford*, 2019 WL 429469, *2 & *9 (Sup. Ct., New York Co., Index No. 652743/2018, February 4, 2019) (holding Sanford "personally liable" as an "*alter ego*" for the "Knopfs' \$9,867,832.61 judgment as against Pursuit.") *Accord: In re Pursuit Holdings, LLC*, 2019 WL 1220928, *1 (Bankr., S.D.N.Y. 2018) (Glenn, J.) ("... the [February 4, 2019] state trial court decision resulted in a judgment entered on March 6, 2019 in favor of the Knopfs and against Sanford ... in the amount of \$10,362,402.99 [citing *Knopf v. Sanford*, Index No. 652743/2018, at Doc. 177].) *See also: Knopf v. Esposito*, 17 Civ. 5833 (DLC), ECF 210 (Ex. A hereto), ¶3, n.1 (the Knopfs consented to the dismissal of Sanford from the *Esposito* civil rights case because "... Mr. Sanford is apparently judgment proof and lawsuits tend to proceed more expeditiously in the absence of *pro se* parties.")

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Eric W. Berry
Eric W. Berry

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